

### REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-14, 16-20, and 22-26 are pending. By this amendment, Claims 1-3, 5, 8-9, 12-14, 16-17, 19-20, 22-23, and 25-26 are amended.

#### I. The Claims Define Patentable Subject Matter

Claims 12-14 and 20 are rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,883,997 to Kim; Claims 1-11, and 16-19 are rejected under 35 U.S.C. § 103(a) as unpatentable over Kim; and Claims 22-26 are rejected under 35 U.S.C. § 103(a) as unpatentable over Kim and further in view of Katsaggelos et al. These rejections are respectfully traversed.

The applied art does not teach, disclose or suggest generating object region data relating to an object region in at least three frames of a moving picture, the at least three frames are lined up in a time-series variation, and obtaining trajectories with each of the trajectories linking the same vertexes through the at least three frames based on the time-series variation, and generating the object region data which includes an approximate function data expressing the trajectories, as claimed in Claim 1 and similarly claimed in independent Claims 12, 16, 20, 22, and 26.

The Office Action asserts that Kim (USP 5,883,977) discusses in column 4, lines 6-15 obtaining trajectories, with each of the trajectories linking the same vertexes through the frames based on the time-series variation of the frames. However, Kim merely teaches a vertex mapping process performed at the vertex mapping block 220. As shown in Fig. 2 of Kim, CC represents a current contour and A to E denotes motion compensated vertices on a predicted contour PC. Accordingly, there is no teaching or suggestion in Kim for obtaining trajectories, with each of the trajectories linking the same vertexes through the at least three

frames based on the time-series variation of the at least three frames, as recited in the independent claims.

Further, the Office Action admits on page 4 that Kim fails to expressly disclose linking the same vertexes through the frames based on the time-series variation of the frames. However, the Office Action asserts that it would have been obvious to one of skill in the art to have Kim's linked vertexes of frames include linking based on the time-series variation of the frames because frames are a timed sequence of digital data that together represent video and linking the vertexes of the frames based on time enables the determination of the change in motion between successive frames. Applicant respectfully submits that it is not necessary to link the vertexes of the frames based on time in order to determine the change in motion between successive frames.

Accordingly, applicant respectfully submits that Kim does not disclose, nor does the Office Action direct Applicants attention to a particular disclosure in Kim, for having the trajectories linking the same vertexes through at least three frames being obtained based on the time-series variation of the at least three frames.

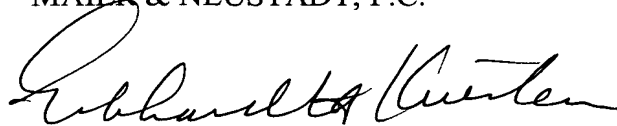
With respect to Claim 22, Claim 22 is rejected based on Kim in view of Katsaggelos. However, Katsaggelos merely teaches describing video objects by texture, shape, and motion. Katsaggelos does not teach, disclose or suggest at least obtaining trajectories with each of the trajectories linking the same vertexes through the at least three frames based on the time-series variation, and generating the object region data which includes an approximate function data expressing the trajectories.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention is patentably distinguishable over the applied art.

The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of this application as presently amended, is respectfully requested.

Respectfully submitted,

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